# BOARD OF BEHAVIORAL SCIENCES FINAL STATEMENT OF REASONS

Section Affected: Section 1887

## **Updated Information**

The Initial Statement of Reasons is included in the file (Tab II). There were no changes to the proposed regulation.

The Board adopted the originally proposed language on April 26, 2002. The Board did not hold a public hearing on this proposed regulation and did not receive a request for a public hearing during the comment period, which was September 6, 2002 through October 21, 2002.

#### **Local Mandate**

A mandate is not imposed on local agencies or school districts.

## **Small Business Impact**

The Board has determined that this action will not have a significant adverse economic impact on small businesses.

#### **Consideration of Alternatives**

No reasonable alternative which was considered or that has otherwise been identified and brought to the attention of the Board would be either more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed regulation.

# Objections or Recommendations/Responses

The Board carefully considered the comment on the proposed regulations. The Board's response is as follows:

**Organization or Individual:** Carl Totton, Psy.D.

**Comment:** Mr. Totton commented that although the proposal did not affect License Educational Psychologists, the proposal would allow Marriage and Family Therapists and Licensed Clinical Social Workers the flexibility in satisfying licensure renewal requirements and, by improving access to continuing education, the Board's mission of protecting consumers through professional regulation would have been enhanced.

**Response:** The Board agrees with the commenter since this proposal will allow licensees the convenience of fulfilling all of their continuing education through interactive, electronic means and will further enhance protection of consumers.